

Remarks

Claims 1-6 are now pending in this application. Applicants have amended claims 1-4 and presented claims 5 and 6 to clarify the claimed invention. Applicants respectfully request favorable reconsideration of this application.

The Examiner rejected claims 1 and 3 under 35 U.S.C. § 102(b) as being anticipated by U.S. patent 5,333,242 to Watanabe et al. or, in the alternative, under 35 U.S.C. § 103(a) as being unpatentable over Watanabe et al. in view of U.S. patent 4,888,708 to Brantmark et al. The Examiner rejected claims 2 and 4 under 35 U.S.C. § 103(a) as being unpatentable over Watanabe et al. in view of Brantmark et al.

Watanabe et al. does not disclose the invention recited in claims 1 and 3 since, among other things, Watanabe et al. does not disclose moving a plurality of manipulators and/or external axes together in a synchronized manner when one of the manipulators/axes is moved with a handheld control tool. Rather, Watanabe et al. discloses a method of setting a coordinate system of a second robot based on a coordinate system of a first robot. The second robot is "installed in substitution" for the first robot. Thus, Watanabe et al. does not disclose that the robots are moved synchronously but rather one robot replaces another.

Additionally, Watanabe et al. does not disclose a handheld robot control. Furthermore, Watanabe et al. does not disclose a control system for controlling both robots. Rather, Watanabe et al. discloses that each robot includes a separate control system.

In view of the above, Watanabe et al. does not disclose the invention recited in claims 1 and 3. Since Watanabe et al. does not disclose the invention recited in claims 1 and 3, the invention recited in claims 1 and 3 is not properly rejected under 35 U.S.C. § 102(b). For an anticipation rejection under 35 U.S.C. § 102(b) no difference may exist between the claimed invention and the reference disclosure. *See Scripps Clinic and Research Foundation v. Genentech, Inc.*, 18 U.S.P.Q. 841 (C.A.F.C. 1984).

Along these lines, anticipation requires the disclosure, in a cited reference, of each and every recitation, as set forth in the claims. *See Hodosh v. Block Drug Co.*, 229 U.S.P.Q. 182 (Fed. Cir. 1986); *Titanium Metals Corp. v. Banner*, 227 U.S.P.Q. 773 (Fed. Cir. 1985); *Orthokinetics, Inc. v. Safety Travel Chairs, Inc.*, 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986); and *Akzo N.V. v. U.S. International Trade Commissioner*, 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986).

The combination of Watanabe et al. and Brantmark et al. does not suggest the invention recited in claims 1-4 since, among other things, the combination does not suggest moving a plurality of manipulators and/or external axes together in a synchronized manner when one of the manipulators/axes is moved with a handheld control tool. Additionally, the combination does not suggest a control system for controlling multiple robots. As described above, Watanabe et al. suggests a method of setting a coordinate system of a second robot based on a coordinate system of a first robot in which the two robots are not moved synchronously. The Examiner only cites Brantmark et al. as suggesting a handheld robot control. Such a robot control does not suggest moving a plurality of manipulators and/or external axes together in a synchronized manner when

one of the manipulators/axes is moved with a handheld control tool or a control system for controlling multiple robots.

In view of the above, the combination of Watanabe et al. and Brantmark et al. does not suggest the invention recited in claims 1-4. Thus, the combination of Watanabe et al. and Brantmark et al. does not make the invention recited in claims 1-4 obvious. Accordingly, Applicants respectfully request withdrawal of the rejection based upon combination of Watanabe et al. and Brantmark et al.

In view of the above, the references relied upon in the office action do not disclose or suggest patentable features of the claimed invention. Therefore, the references relied upon in the office action do not anticipate the claimed invention or make the claimed invention obvious. Accordingly, Applicants respectfully request withdrawal of the rejections based upon the cited references.

In conclusion, Applicants respectfully request favorable reconsideration of this case and issuance of the Notice of Allowance.

If an interview would advance the prosecution of this case, Applicants urge the Examiner to contact the undersigned at the telephone number listed below.

The undersigned authorizes the Commissioner to charge fee insufficiency and credit

overpayment associated with this communication to Deposit Account No. 22-0261.

Respectfully submitted,

Date: September 7, 2011

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